

CGB-CC-0067



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FIRST BAPTIST CHURCH

C O L U M B U S G E O R G I A

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20554

Petition for Exemption from Closed Captioning Requirements

Introduction

First Baptist Church of Columbus Georgia was founded in 1829, with the sole mission of telling others about the love of Christ, and ministering to the needs of the community. We are located in the middle of downtown Columbus. We have had our 11:00am service on live broadcast for over 40 years.

Our program as stated earlier is live. We air our normal service to be viewed by those not able to come to the worship service for whatever reason. This provides a ministry to the community way beyond the actual doors of the church.

The worship services airs weekly on Sunday at 11:00 am and last for an hour. WTVM channel 9 broadcast the service. Our church members staff the cameras and then send a feed to the TV station.

The service is not scripted, therefore, the news department would not have a manuscript available for input into the closed caption equipment. It would be a costly, difficult burden upon the church to provide a service that has not been requested of us by anyone from our viewing area.

For the reasons set forth below, First Baptist Church of Columbus Georgia hereby requests an undue burden exemption from the closed captioning rules for our 11:00 am live worship service, pursuant to 79.1(f) of the Commission's rules.

Nature and Cost of Closed Captions

We have reviewed several options to provide closed caption for a live broadcast, due to some of the words in the Bible the closed caption option of converting the spoken word over a computer system would not work because of word recognition complicated by the biblical and theological words (often from the Greek, Latin or Hebrew languages) which are much more difficult for voice recognition software to accurately understand. The only option that we feel would work is hiring a court reporter to be at each service to type the words on a system as they are spoken. After much searching we have only found one person in our community that is willing and able to do this at an estimated cost of \$250 per hour. Our fear is when this person is sick or unable to work on a particular Sunday we would not be able to be on the air.

Impact on the Operation of the Program Provider

The total cost to air the worship service is \$900 per week payable to the TV station. It is impossible to put a dollar figure on the time our volunteers put in to produce the program. Closed caption would increase our costs by over 25% based on the fee listed above. The court reporter told us that our startup costs would be higher as she would take the more difficult words of the Bible (before the service) and input them into her system to make it easier for the live broadcast, as time went on her data base would have most of the terminology used. The impact this cost would have on our overall ministry to the community is that we would have to decrease funds being used for other ministries in order to continue the TV broadcast. Such a change would require a revisiting our total church budget including commitments already made to ministries and programs during a fiscal year.

Financial Resources of the Program Provider

Our church is a non-profit organization, all of our revenue is derived from the contributions of our members. The largest part of our expenditures is personnel, we are a hands on ministry to the community which provides various services to meet various individual needs. The cost of programming would not reduce any one specific area but would have to be spread throughout many areas so as not to totally wipe out any ministry.

Type of Operations of the Program Provider

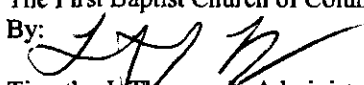
First Baptist is a non-profit religious institution and its major operation is to minister to the community. The live broadcast gives the church the opportunity to reach more of the area than it could otherwise. The 11:00 am service is the highlight of the week and the core of the total ministry.

Other Factors

Our program is only aired on WTVM Channel 9, one of the local stations of the community. We believe that the local, non-news exemption to the closed captioning rules also applies to the 11:00 am worship service of First Baptist Church. As noted above, the program is produced and distributed locally, and the sermons of First Baptist Church are of primarily local public interest. The services are not news, they do not have repeat value, and the electronic newsroom technique is not available. Notwithstanding the applicability of the exemption, we have filed this petition in an abundance of caution and for the purpose of establishing certainty.

Conclusion

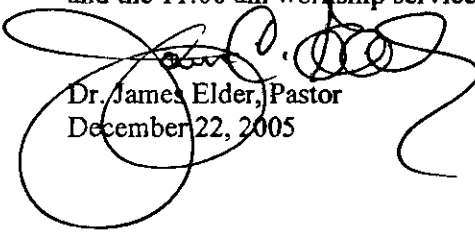
As shown by this Petition and its attachments, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The costs of captioning would be excessively high and would have a significant impact on Petitioner's operations. The Petitioner's type of operations and financial resources are different in kind and magnitude from a mainstream programming provider. Because of the significant difficulty and expense of providing closed captions, a waiver under 79.1 (f) is warranted. If more information is needed, please contact me at the address provided below.

Respectfully submitted,
The First Baptist Church of Columbus
By: 

Timothy J. Thompson, Administrator
PO Box 828
212 12th Street
Columbus, Ga 31901
706-322-4468
706-324-7422 Fax
December 22, 2005

Declaration

I, Dr. James Elder, am the Pastor of First Baptist Church, and I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of First Baptist Church in this matter, and, upon information and belief, believe the statements regarding our organization and the 11:00 am worship service to be true and accurate.



Dr. James Elder, Pastor
December 22, 2005

Schedule

Our service is aired on every Sunday morning at 11:00am until 12 Noon.

First Baptist Church
MONTH END INCOME STATEMENT
MONTH END NOVEMBER 30, 2005

Accounts	Annual Budget	MTD Actual	YTD Total	Budget Remaining	% Budget Used
<u>Revenues</u>					
REVENUES					
410000 - Current Fund Income	\$1,348,525.00	\$93,021.64	\$1,033,460.59	\$315,064.41	76.64%
420000 - Mission Fund Income	\$166,475.00	\$12,684.77	\$140,940.04	\$25,534.96	84.66%
430002 - Corporate Center Revenue	\$155,377.00	\$0.00	\$129,480.70	\$25,896.30	83.33%
Other Revenue	\$53,099.00	\$2,564.44	\$46,944.53	\$6,154.47	88.41%
Total Revenues	\$1,723,476.00	\$108,270.85	\$1,350,825.86	\$372,650.14	78.38%

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Expenses

LOCAL OPERATIONS

MINISTRIES

501000 - Evangelism	\$2,500.00	\$85.47	\$85.47	\$2,414.53	3.42%
506000 - Educational Literature	\$29,200.00	\$1,581.92	\$30,965.05	-\$1,765.05	106.04%
508000 - Leadership Training	\$2,500.00	\$0.00	\$76.99	\$2,423.01	3.08%
509000 - Social Fund	\$2,000.00	\$60.00	\$1,603.99	\$396.01	80.20%
510000 - Women On Mission	\$3,795.00	\$602.56	\$2,739.20	\$1,055.80	72.18%
511000 - Sound System & TV	\$2,700.00	\$0.00	\$1,031.15	\$1,668.85	38.19%
512000 - Vacation Bible School	\$3,000.00	\$0.00	\$2,721.38	\$278.62	90.71%
513000 - Preschool Ministry	\$2,400.00	\$0.00	\$1,466.15	\$933.85	61.09%
514000 - Library Supplies	\$600.00	\$78.75	\$503.75	\$96.25	83.96%
515000 - Bibles	\$750.00	\$0.00	\$235.99	\$514.01	31.47%
518000 - Church Publications	\$16,000.00	\$123.54	\$13,203.74	\$2,796.26	82.52%
Music	\$40,350.00	\$745.65	\$20,386.21	\$19,963.79	50.52%
522600 - Outreach	\$2,150.00	\$968.45	\$1,206.71	\$943.29	56.13%
523000 - Children's Ministry	\$4,900.00	\$132.27	\$2,763.13	\$2,136.87	56.39%
524000 - Youth Ministry	\$17,500.00	\$1,185.55	\$11,153.53	\$6,346.47	63.73%
524200 - Parking Lot Party	\$2,250.00	\$283.00	\$2,420.40	-\$170.40	107.57%
524400 - Youth Ski Trip	\$8,000.00	\$1,465.00	\$1,715.00	\$6,285.00	21.44%
524500 - College & Career Ministry	\$4,900.00	\$550.00	\$972.08	\$3,927.92	19.84%
525000 - Senior Adult Ministry	\$6,000.00	\$106.19	\$1,083.06	\$4,916.94	18.05%
526000 - Young/Median Adult Ministry	\$800.00	\$0.00	\$1,979.12	-\$1,179.12	247.39%
526500 - Singles Ministry	\$1,200.00	\$0.00	\$138.29	\$1,061.71	11.52%

First Baptist Church
MONTH END INCOME STATEMENT
MONTH END NOVEMBER 30, 2005

Accounts	Annual Budget	MTD Actual	YTD Total	Budget Remaining	% Budget Used
572300 - Pastor's Car Expenses	\$4,000.00	\$1,133.16	3938.36	\$61.64	98.46%
572400 - Van Expenses	\$4,500.00	\$131.35	3467.26	\$1,032.74	77.05%
572500 - Parking Security Services	\$2,200.00	\$519.20	4435.54	-\$2,235.54	201.62%
572700 - Ministerial Planning	\$500.00	\$0.00	\$285.28	\$214.72	57.06%
572800- Apartment & Book Exp.	\$1,620.00	\$0.00	\$2,558.44	-\$938.44	157.93%
502000 - Pulpit Guests	\$1,000.00	\$0.00	2588.78	-\$1,588.78	258.88%
502800 - Sportsman Dinner	\$3,500.00	\$0.00	4517.48	-\$1,017.48	129.07%
503200 - Church-Publicity/Promo	\$30,000.00	\$3,280.00	8439.54	\$21,560.46	28.13%
503250 - Web Page	\$1,000.00	\$0.00	385	\$615.00	38.50%
Convention Expenses	\$10,100.00	\$300.59	4673.76	\$5,426.24	46.27%
Mileage Allowances	\$6,820.00	<u>\$442.80</u>	<u>2382.09</u>	<u>\$4,437.91</u>	34.93%
Total Administration	\$504,700.00	\$34,161.58	\$395,003.42	\$109,696.58	78.26%
Bldg Maintenance/Repairs	\$71,650.00	\$5,664.70	\$72,436.59	-\$786.59	101.10%
PERSONNEL SALARIES					
Ministerial Staff	\$379,780.00	\$28,095.32	\$319,533.26	\$60,246.74	84.14%
Ministry Assistants	\$124,185.00	\$9,508.92	\$108,255.79	\$15,929.21	87.17%
Custodial	\$90,321.00	\$7,558.33	\$84,145.20	\$6,175.80	93.16%
Kitchen	\$55,484.00	\$4,877.91	\$51,918.16	\$3,565.84	93.57%
Nursey	\$25,000.00	\$1,287.10	\$14,206.18	\$10,793.82	56.82%
Other	<u>\$48,666.00</u>	<u>\$2,923.27</u>	<u>\$33,293.86</u>	<u>\$15,372.14</u>	68.41%
Total PERSONNEL SALARIES	\$723,436.00	\$54,250.85	\$611,352.45	\$112,083.55	84.51%
Total LOCAL OPERATIONS	\$1,484,301.00	\$103,824.35	\$1,197,130.49	\$287,170.51	80.65%
MISSIONS					
NONLOCAL MISSIONS 12%					
Cooperative Program	\$14,650.00	\$1,022.03	\$11,354.81	\$3,295.19	77.51%
International Missions	\$8,490.00	\$592.29	\$6,580.31	\$1,909.69	77.51%
North American Missions	\$1,333.00	\$93.05	\$1,033.81	\$299.19	77.56%
CBF of Georgia	\$9,988.00	\$696.93	\$7,742.91	\$2,245.09	77.52%